

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

INTEGRATED HEALTH SERVICES OF CLIFF MANOR, INC., INTEGRATED HEALTH SERVICES AT RIVERBEND, INTEGRATED HEALTH SERVICES AT SOMERSET VALLEY, INC., ALPINE MANOR, INC., BRIARCLIFF NURSING HOME, INC., INTEGRATED HEALTH GROUP, INC., SPRING CREEK OF IHS, INC., FIRELANDS OF IHS, INC., ELM CREEK OF IHS, INC. and IHS LONG TERM CARE SERVICES, INC.

Plaintiffs,

v.

THCI COMPANY LLC,

Defendant,

and,

ABE BRIARWOOD CORPORATION and JOHN DOES 1-10,

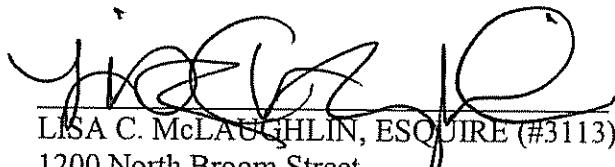
Additional Counterclaim  
Defendant.

Civil Action No.: 04-910 (GMS)

**MOTION BY THCI COMPANY, LLC TO ENFORCE  
THE STIPULATION AND ORDER OF SETTLEMENT AND DISMISSAL**

Defendant THCI Company, LLC, by and through its undersigned counsel, files a Motion to Enforce the Stipulation and Order of Settlement and Dismissal (hereinafter the "Motion"). In support of the Motion, THCI Company, LLC relies on its Brief filed simultaneously herewith.

PHILLIPS, GOLDMAN & SPENCE, P.A.



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Dated: